

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
ALEXANDER NORRIS

Plaintiff,

v.

Marc Goldner, Individually and as Officer
of GOLDEN BELL ENTERTAINMENT,
LLC, a California company and GOLDEN
BELL STUDIOS, LLC, GOLDEN BELL
ENTERTAINMENT, LLC., a Nevada
Company and GOLDEN BELL STUDIOS,
LLC,

Defendants.
-----X

Case No.: 19-cv-05491-PAE-SN

**DECLARATION OF ALEXANDER
NORRIS IN OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT.**

I, Alexander Norris, being of full age and under oath, do hereby affirm as follows:

1. I am the plaintiff in this action. I make this declaration in opposition to Defendants' Motion for Summary Judgment.

2. In early 2017, Defendants entered into an agreement with Jason Wiseman, a true and correct copy of which is annexed as Exhibit 23.¹

3. On October 3, 2018, I emailed Defendants requesting payment for the files I had sent them. On that date, Marc Goldner responded that he had the files, but needed copies of those files in pdf so that he could review them. A true and correct copy of that email is annexed as Exhibit 24.

¹ Exhibits 1-22 have been submitted in support of my Motion for Summary Judgment, or Alternatively, Partial Summary Judgment.

4. On August 18, 2022, I sat for a deposition in this matter, the relevant pages of which are annexed hereto as Exhibit 25.

WHEREFORE, I respectfully request that the Court grant Plaintiff's motion for the reasons stated therein.

I certify that the statements made herein are true and accurate to the best of my recollection, knowledge, information and belief. I am aware that willfully false statements are subject to punishment.

Dated: Margate, United Kingdom
December 16, 2022

Alexander Norris
Alexander Norris

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of December 2022, I caused to be served a copy of the foregoing, and the exhibits cited therein, via the Court's ECF filing system, on the following:

Gerard Patrick Fox
Gerard Fox Law, P.C.
1880 Century Park East
Suite 1410
Los Angeles, CA 90067
310-441-0500
Email: gfox@gerardfoxlaw.com

Ryan Dolan
Gerard Fox Law P.C.
1345 Sixth Avenue
33rd Floor
10105
New York, NY 10006
661-364-7254
Email: rdolan@gerardfoxlaw.com

Attorneys for Defendants

/s/ Kyle G. Kunst
Kyle G. Kunst